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ABSTRACT

Information concerning accreditation in higher education--a process of quality control and evaluation of institutional program development, effectiveness, and improvement that is based on established criteria and standards--is presented. Thirty-three questions and answers on accreditation are provided to clarify many concerns regarding the status or nonstatus of the institution at which a student is currently enrolled, that a prospective student is considering, or from which an alumnus has graduated. The process of accreditation is voluntarily initiated by the institution and is completed and continuously monitored with the accrediting agency. Historical developments concerning accreditation are briefly traced, and information is presented on the Council on Postsecondary Accreditation (COPA); the U.S. Department of Education and its Eligibility and Agency Evaluation Staff (EAES); the National Association of Private Nontraditional Schools and Colleges (NAPNSC); regional (institutional) accrediting associations; national (specialized/programmatic--in some cases also institutional) accrediting agencies and associations; and statewide (institutional) accrediting bodies. Information is presented on the costs of accreditation. Specific concerns regarding the NAPNSC are addressed, including its status and relationship to EAES and COPA and the way that private, free-standing, nontraditional universities and colleges have responded to this association and the prospect of affiliation. Organizational and bibliographic sources that can provide additional information are listed. (SW)

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NATIONAL ASSOCIATION OF PRIVATE, NONTRADITIONAL
SCHOOLS AND COLLEGES

ACCREDITATION FACT SHEET

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NATIONAL ASSOCIATION OF PRIVATE, NONTRADITIONAL SCHOOLS AND COLLEGES

ACCREDITATION FACT SHEET

Often the many aspects of the topic of accreditation arise as they concern the status or nonstatus of the institution at which a student is currently enrolled, or that a prospective student is considering, or from which an alumnus has graduated. Misconceptions and abundant misinformation about accreditation can be very confusing and frustrating to say the least.

The following questions are some of those which are likely to have been asked already or that may be encountered in the future. These questions are accompanied by accurate answers that have been carefully researched by the NAPNSC Commission Office through examination of pertinent documents, published studies and texts, telephone survey and pilot distribution-feedback. This information is provided to assist you in you understanding and your explanations of accreditation.

. . . . . .

1. Q. **What is accreditation and what is its origin?**

   A. Accreditation is a process of quality control and evaluation of institutional-program development, effectiveness and improvement, on the basis of established criteria and standards. The process is voluntarily initiated by the institution and completed and continuously monitored with the accrediting agency to instate and invest the institution's learning/degree programs with integrity and validity for credibility to all of the institution's present and potential clientele as well as all of the academic and professional-technical communities and the general public.

   Some would contend that the most profound and true form of accreditation is the establishment of a reputation of excellence of an institution through the demonstrated performance of its graduates in academic, professional or technical fields in which they had their formal learning programs. In any case to be accredited is to be rendered both credible (believable) and creditable (praiseworthy and reputable) to all sectors of an institution's public.

   Isolated instances of institutional monitoring by college governing boards in the states of New York (1784-87), Iowa (1846), Utah (1896), Washington (1909), Virginia (1912), and Maryland (1914), bore some resemblance to some present accreditation practices.

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Early influence and involvement in the beginnings of standardization of graduate school programs came from the Association of American Universities (AAU) in about 1900.

The sole early case of federal participation in accrediting activity involved the establishment of regulations for college preparation and examination in veterinary medicine by the Department of Agriculture and the Civil Service Commission. This federal influence continued from 1879 until 1957 when the accrediting function for veterinary medicine was completely assumed by the American Veterinary Medicine Association founded in 1932.

As early as the year 1885, colleges in the U.S.A. began to gather in regions and to form associations in an initial effort to standardize entrance requirements of high (prep) school graduates applying as college freshmen (the New England Association of Schools and Colleges made initial plans in 1884 with formal organization and founding following in 1885). This resulted in the establishment of the College Entrance Examination Board (CEEB) in 1901 with the continued formation of regional and some specialized associations of schools and colleges and the beginnings of their accrediting activities following a few years later (the North Central Association of Colleges and Secondary Schools and the American Medical Association published the first lists of accredited and/or classified schools in 1913 and 1906 respectively). The first list of regionally accredited schools was published 62 years before COPA was founded by the merger of the National Commission on Accrediting (NCA) and the Federation of Regional Accrediting Commissions of Higher Education (FRACHE) in 1975, and 55 years before events incident to imposition of PL 82-550 (the Veterans' Readjustment Assistance Act of 1952), led to the eventual formation of the federal bureau in the Department of Education known as the Accreditation and Institutional Eligibility Staff (AIES) in 1968--later known as the Eligibility and Agency Evaluation Staff (EAES) in 1980. Some perspectives afforded from this historical information are:

1. The initial impetus and the predominant influence for actual development of prototype accreditation criteria, standards, procedures and instruments came from concerned institutions, <u>not</u> from the federal government.

2. From its very beginnings, accreditation has been a voluntary, largely private endeavor for both the institution <u>and</u> the accrediting agency rather than a governmental activity.

3. The commonly used criteria and standards for pre-accreditation affiliations such as Candidate status as well as Accreditation status have evolved through mutual consensus of the academic faculties and administrative staffs of peer institutions. The most common application procedure requires that each potential or candidate member institution perform an in-depth introspection (self study) on the basis of its own self-developed educational philosophy, purposes and objectives. The written self study and the institution are then scrutinized periodically by visiting teams of professional examiner-colleagues from other institutions. Such on-site evaluations are also performed on the basis of the institution's philosophy, purposes and objectives, insofar as said philosophy, purposes and objectives are deemed as educationally defensible, as well as on the basis of the accrediting agency's established criteria and standards.

Again it is stressed, with few exceptions, that accreditation originated from within the ranks of educational institutions and their own governing boards rather than as an imposition upon them from the federal government.

The concept and practice of accreditation is a unique phenomenon of American origin although many other countries are now using the term and modifications of the concept in their Ministries of Education.

2. Q. **What is COPA?**

A. The Council on Postsecondary Accreditation (COPA) is a private, nonprofit corporation, the governing board of which consists of representatives of each of the Boards or Commissions of the six (6) regional-institutional accrediting associations and forty (40) national-institutional-specialized-programmatic accrediting associations and agencies plus two staff members, the presidents of institutions representing the major higher education associations and representatives of the general public. COPA was formed in 1975 from the merger of agencies of the National Commission on Accrediting (NCA) and the Federation of Regional Accrediting Commissions of Higher Education (FRACHE) into one monitoring umbrella organization fostering probity-consistency and nonproliferation of accreditation procedures and agencies.

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3. Q. **What is USED?**

A. The U. S. Department of Education (USED)--(acronym reversal to avoid confusion with the Department of Energy) is a federal bureau recently taken from the Cabinet, formerly known as HEW, and given separate Cabinet status by the Carter Administration in 1980. The Department has many fully staffed divisions which provide a variety of services such as analysis, evaluation, consultation, coordination and regulation. One such division known as the Eligibility and Agency Evaluation Staff (EAES), is responsible for determining whether those accrediting agencies which submit petitions are reliable authorities to monitor and promote quality of education offered (see question #4).

4. Q. **What is EAES?**

A. The Eligibility and Agency Evaluation Staff (EAES) was first founded in 1968 as the Accreditation and Institutional Eligibility Staff (AIES) within the U.S. Office of Education (USOE), which itself was within the Department known then as Health, Education and Welfare (HEW). The EAES performs analytical and consultation functions to arrive at recommendations regarding the reliability of petitioning accrediting agencies. The resulting analyses and recommendations are ordinarily corroborated by the Advisory Committee on Accreditation and Institutional Eligibility (see questions #10 and #11) and then given to the U.S. Secretary of Education who has the responsibility of deciding whether an agency is to be recognized and listed as a reliable authority. The formal criteria for evaluating accrediting agencies and associations for recognition and listing for the determination of eligibility of institutions to participate in federally funded student financial aid programs, were formed and first published in 1952, used, evolved and published again in the January 16, 1969 Federal Register, then refined to their present state as published in the Federal Register of August 20, 1974. These criteria are still in use. The staff name was changed to Division of Eligibility and Agency Evaluation (DEAE) in 1976 and again changed to its present name of Eligibility and Agency Evaluation Staff (EAES) in 1980 as a component of the new Department of Education. The Staff now has two sections, the functions of which are review and determination of reliability of authority and quality of education offered, ultimately for the Secretary of Education's decision of recognition for eligibility and educational quality, and are referred to as:

1. Agency Evaluation Section: For review, recognition and listing of accrediting agencies and associations for determination of institutional eligibility, and

2. Institutional Eligibility Section: For direct determination of institutional eligibility through certification of academic credit transfer and acceptance by other institutions already accredited by USED recognized agencies or associations.

The institutional constituencies of the seventy-five (75) agencies and associations (including: sixty-eight (68) national institutional and specialized agencies, the six (6) regional associations and one (1) state agency--the New York State Board of Regents) which are recognized and listed by the EAES as of February 1980, are only a partial accounting of the total eligible institutions. Thirty-seven (37) of the sixty-eight (68) national institutional-specialized-programmatic accrediting agencies are also recognized and listed by COPA.

5. Q. **Can just any group of organizations band together under the guise of universities or colleges and form their own accrediting association?**

A. Deceptive organizations purporting to be educational institutions (diploma mills) can, in some circumstances, be legally created which can in turn create, legally, their own "accrediting agency." Upon close, in-depth examination however, you will find that neither such pseudo institutions nor such pseudo accrediting associations will have developed defensible learning programs and examinations or defensible evaluating criteria, standards or procedures respectively. By the same token such deceptive "accrediting" agencies are unlikely to have undergone sufficient development to seriously petition the Department of Education's Eligibility and Agency Evaluation Staff (EAES), or apply to the Council on Postsecondary Accreditation (COPA), for recognition and listing.

6. Q. **What is the National Association of Private, Nontraditional Schools and Colleges?**

A. The National Association of Private, Nontraditional Schools and Colleges is a legally constituted, nonprofit accrediting agency established by, and to provide accreditation service for private, freestanding, alternative schools, colleges and universities through the development and application of qualitative, performance-based criteria. The NAPNSC functions as an accrediting agency as well as performs in a consulting capacity for

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entire educational institutions employing flexible, diverse teaching/learning strategies producing outcomes with competencies comparable in areas of knowledge to those identified in traditional education systems. The Association is headquartered and authorized by nonprofit corporation charter in the State of Colorado (April 9, 1974).

7. Q. **What is the purpose of the National Association of Private, Nontraditional Schools and Colleges?**

A. The Association was formed for the express purpose of identification, quality control and improvement of those private, freestanding, nontraditional colleges and universities (whether nonprofit or proprietary) desiring entry into a rigorous accreditation process conducted with criteria and standards designed specifically for such institutions.

8. Q. **If you are accrediting, offering, enrolled or otherwise engaged in truly nontraditional educational programs why do not the degrees or other credentials to be earned have truly nontraditional titles?**

A. Upon first examination the question seems to involve a logical analogy. A more in-depth consideration, however, will reveal the obvious reality that the degree earned by completion of any viable, defensible educational program must convey the familiar, expected meanings to the academic and professional realms for which they are intended in order to be acceptable or "marketable" if you will. An equally obvious reality which follows is that the knowledge and other competency outcomes resulting from the programs leading to such familiar, expected degree titles must be comparable, equivalent and commensurate with what is expected no matter how the programs are conducted, or by which institutions they are offered, or how their learning outcomes are assessed, or by which agency they are accredited, in order to be acceptable to the intended receiving institutions.

If the above question requires (suggests) a complete departure from the traditional levels and qualifiers in degree titles which are Bachelor, Master, Doctor and Science, Arts, Philosophy, Education, Business Administration, Engineering, etc., etc. respectively, and yet equivalence is to be strived for, then ludicrous degree titles such as "Professional Practitioner of Pedagogy" (PPP) or "Erudite Explicator of Epistemology" (EEE) must be coined. Obviously no legitimate educational institutions are seriously considering giving such titles to their degrees whether the programs are regarded as traditional or nontraditional, nor whether the institutions

are regionally or nationally accredited, and they should not be expected to do so.

If on the other hand the above question means that new emerging disciplines for which there are demonstrated needs might appropriately call for degree titles with new academic or professional-technical qualifiers coupled with familiar level indicators such as Master of Marine Science (MMS), or Master of Logistical Science (MLS), or Doctor of Humane Services (DHS), then that is a different matter and should be addressed by all institutions of higher education whether identified as traditional or nontraditional. In any case the common determinant in resolution of the above question is to be found in and based upon needs of the evolving academic, professional and technical communities.

9. **Q. What is the relationship and status of the National Association of Private, Nontraditional Schools and Colleges to/with the Department of Education's Eligibility and Agency Evaluation Staff (EAES) and the Council on Postsecondary Accreditation (COPA)?**

A. The criteria, standards and procedures developed and used by the Association have been and continue to be patterned after the eligibility criteria which are required of accrediting agencies seeking recognition and listing by the U.S. Department of Education. The NAPNSC submitted its initial petition with all required documentation to the DEAE Staff in August, 1976. Formal reviews with denial actions and resulting additional and redevelopment following the initial petition, a repetition in August of 1977, and a rehearing in 1979, have progressively reduced the criteria with which the Association was held to be in noncompliance to thirteen (13) from the total published thirty-seven (37) criteria. The NAPNSC is continuing in its development and refinement for improved accrediting service as well as its petitioning effort for recognition and listing by the Department of Education.

The Association is also engaged in recently revised (April 15, 1981) application procedures required by the Council on Postsecondary Accreditation (COPA) for recognition and listing as an accrediting agency by that private corporate agency. The Association's formal, initial application to COPA was submitted in August, 1977 with all required documentation. That initial application has been held in abeyance since the date of submission pending the COPA Board's formulation of policy(ies) for accrediting nontraditional education following the Kellogg-funded COPA Project published in September, 1978.

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Both the petitioning of the Department of Education and the application to the Council on Postsecondary Accreditation for recognition and listing require methodical, detailed procedures that are understandably protracted over time to ascertain an accrediting agency's need, viability and effective performance in actual practice.

Earlier stages of the establishment of a professional or academic discipline, or less familiar theories and strategies of teaching/learning/assessment, may be factors in cases of prolonged petitioning process. The span of fifteen (15) years from the date of the officially filed petition (1959), to the date of initial recognition and listing (1974) of the Council on Chiropractic Education by the Commissioner of Education, would seem to attest to the first of the above factors.

10. Q. **What are the Association's projected plans for continued seeking of national recognition?**

A. Both COPA and EAES are kept informed of progress of the Association and its member institutions. Consultation meetings are held periodically with both organizations regarding status of the application and re-petition respectively. The Association will be prepared to submit an updated re-petition to EAES during the 1981-82 academic year whether the EAES can conduct a review as required with a quorum of its Advisory Committee or must function with an alternate process. The former petitioning deadline three months in advance of a quarterly review is no longer required.

11. Q. **What are the bureaucratic mechanisms in the Department of Education for determining institutional eligibility for federal funding and what are their statuses?**

A. The Advisory Committee on Accreditation and Institutional Eligibility was established by charter in 1968, the same year as the founding of the AIPS (see question #4), under the Federal Advisory Committee Act (Public Law 92-463) with a full complement of fifteen members appointed to three-year terms. The Committee represents secondary and postsecondary education interests in institutional, student, state department, association and public sectors. It has functioned in the determination of eligibility as provided by the enactment of the Veterans' Readjustment Assistance Legislation of 1952 (Public Law 82-550), and is required by mandate to function as a joint review body with the Eligibility and Agency Evaluation Staff (EAES) following thorough staff analyses and recommendations.

Until November, 1980, the EAES within the Department of Education had not conducted a formal quarterly review from which actions of recognition, renewal, denial or deferral could be taken by the former Commissioner of Education or the new Secretary of Education, since June of 1979. This interruption had been caused by the Advisory Committee's inability to assemble with the minimum required quorum of eight (8) members due to expired terms. The EAES cannot now conduct a formal, quarterly review from which a determination of eligibility can be made because to this date (September 1, 1981) an advisory committee has not yet been appointed even though its charter and authority were extended with the Higher Education Amendment of 1980. Formal quarterly reviews following staff analysis have been the pattern of this process but are not required. An assessment of the shifting factions in the overall accreditation picture in the midst of an administrative transition and lessened federal involvement in education seems to portend some continued uncertainty until some time later in this 1980-81 academic year or beyond.

12. **Q. Is there a notable historical difference in the process of determination of reliability of authority of accrediting agencies and associations for ascertaining educational quality (petitioning and otherwise) as recognized and listed by the Department of Education and formerly the U.S. Office of Education since the advent of that process in 1952?**

A. Agencies and associations listed in National Recognized Accrediting Agencies and Associations, published by the Department of Education, Washington DC, November, 1980, with dates of initial recognition later than 1952, were considered with criteria and procedures of gradually increasing rigor and complexity until the present system of criteria with petitioning procedures was developed and published (1974).

Those agencies and associations listed with the initial recognition date of 1952 were given such recognition the same year (1952) that the USOE criteria were first published and thereby made available as evaluating indices. This historical coincidence precluded a methodical due process of petitioning and gradual agency development and accountability in accordance with the published criteria.

To say that those accrediting bodies with an initial recognition and listing date of 1952 were "grandfathered in" is probably an oversimplification of the bureaucratic processes in place at the federal level in that

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year; nevertheless, suffice it to say that the criteria and decision-making mechanisms used for reviewing agencies with the 1952 initial listing date were far simpler and more expeditious than those currently in effect.

Those accrediting agencies and associations with the initial recognition and listing date of 1952 include:

Regional (Institutional) Accrediting Associations

New England Association of Schools and Colleges
Commission on Institutions of Higher Education

Southern Association of Schools and Colleges

Northwest Association of Schools and Colleges

North Central Association of Colleges and Schools

Western Association of Schools and Colleges

Middle States Association of Colleges and Schools

National (Specialized-Programmatic--in some cases also Institutional) Accrediting Agencies and Associations

American Medical Association

National Architectural Accrediting Board, Inc.

American Association of Bible Colleges

American Assembly of Collegiate Schools of Business

American Dental Association

Engineers' Council for Professional Development

Society of American Foresters

American Council on Education for Journalism

American Occupational Therapy Association

American Optometric Association

American Osteopathic Association

American Council on Pharmaceutical Education

American Podiatry Association

Council on Social Work Education

National Council for Accreditation of Teacher Education

Association of Theological Schools in the United States and Canada

American Veterinary Medical Association

Statewide (Institutional) Accreditation

New York State Board of Regents

13. Q. **Is not the connection with, or use of, private accrediting bodies by the Federal government, as reliable authorities to monitor and promote quality of education offered, for identification of institutions for eligibility to participate in federally funded student financial aid programs, itself a case of conflict of interest? (i.e., does not the inevitable consideration of potential federal monies hanging in the balance for given institutions, contaminate the accreditation process and thereby detract from the autonomy of the private accrediting agency's decision making capacity and process?)**

A. This issue was raised by the Carter administration through HEW Secretary Joseph Califano with a proposed alternative involving a severance of the eligibility connection between the federal government and private accreditation. The proposal included the suggestion of transferral of eligibility determination to state departments of education or other state level agencies as presented to Congress by then USOE employee Michael O'Keefe in July, 1979.

The "O'Keefe Proposal" understandably met with strong opposition and counter proposals from COPA through the American Council on Education (ACE) because, as is often the case, the cohesion and viability of agencies, public or private, depend in part upon continued allegiance of constituencies through consideration of a bottom-line, monetary factor.

The eligibility transferral issue is yet unresolved but will probably be reconsidered in several forms. The Reagan administration's proposals of overall reallocation of determinations of aid to education, from federal to state agencies, (block grants, etc.) are expected to be tested in the legislative process. Such scaling down of federal involvement in Education may

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well be protracted over a two (2) to four (4) year period.

14. Q. **To what extent might legitimate concerns be held for equity, reciprocity and duplication of efforts between, and ultimately cost effectiveness of USED recognized and listed, national-programmatic accrediting agencies and regional-institutional accrediting associations?**

A. To bring resolution to the above question a summary of responses by telephone survey of the six (6) regional accrediting associations and twenty-three (23) national-programmatic agencies during July, 1981, is given below with the survey questions:

1. Has, does or will your regional-institutional association accept(ed) and process(ed) and favorably act(ed) upon an application for an accreditation status from an educational degree granting institution which does not already have a COPA recognized, programmatic, accreditation status (for) (in) all of its separate academic divisions or programs?

   Yes 6 No 0 Qualification(s): Each regional-institutional accrediting association indicated that they looked at the whole institution when processing and acting upon applications.

2. If not, why?

3. Does your regional-institutional accrediting association have a policy of requiring that an educational, degree granting institution which desires to enter your accreditation process already have a COPA recognized, programmatic, accreditation status (for) (in) all of its separate academic divisions or programs before accepting, processing, and acting favorably upon an application from that program?

   Yes 0 No 6 Qualification(s): It is sometimes asked of the specialized programs why they have not sought programmatic accreditation first, but this does not stop the processing of or acting upon an application.

4. If so, why?

5. Has, does or will your national-programmatic accrediting agency accept(ed), process(ed), and favorably act(ed) upon an application for an accreditation status or for individual membership from a holder of a degree from a program or a degree program within an educational institution which does not already have candidate status or accreditation status in a COPA recognized, regional, accrediting association?

Yes 8 No 15 Qualification(s): One accrediting agency indicated that it depended upon whether the application is for a degree program or for individual membership. If it is for individual membership the application would be accepted, processed and acted upon, but if it is for a degree program the institution from which it is within must have regional accreditation before acceptance and action is taken. Two other agencies reported that they needed state approval for the programs they accepted, processed, and acted upon rather than needing regional accreditation.

6. If not, why?

The agencies contacted whose answer was No to the above question indicated that COPA recognized, regional accreditation of an institution was the first step in gaining accreditation status for a degree program and that an application would not be accepted without the regional accreditation status.

7. Does your national-programmatic accrediting agency have a policy of requiring that a degree or other learning program which desires to enter your accreditation process already have regional-institutional accreditation coverage or candidate status in a COPA recognized, regional accrediting association before accepting, processing, and acting favorably upon an application from that program?

Yes 15 No 8 Qualification(s):

8. If so, why?

Agencies who answered Yes to the above question reported that the policy of requiring regional accreditation before an application was accepted, processed, and acted upon was a part of their own accreditation process.

From analysis of the above summary of survey data, as obtained July, 1981, it would appear that measures are needed to rectify inadequate cost effectiveness caused by duplication of efforts, inconsistent or unequal reciprocity, and inherent and perhaps inadvertent inequity of services of a federal bureau and subsequently federally endorsed, private agencies.

15. Q. **How does an accrediting association achieve accreditation rights and can an accrediting agency carry on a legitimate accrediting function without formal national recognition?**

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A. Neither COPA nor the EAES confer the rights of accreditation upon an agency. On the contrary, specific required criteria for application for recognition and listing by COPA as well as petitioning the Eligibility and Agency Evaluation Staff (EAES) of the Department of Education (USED) stipulate that the applying/petitioning agency must have established a record of legitimate accrediting activity as an accrediting body well before an application or petition is ever submitted. The EAES criterion specifies "not less than two years' experience as an accrediting agency or association."

16. Q. **How many member institutions are needed to form an accrediting association and what are the prospects for continued growth of NAPNSC?**

A. The NAPNSC is passing through many of the same phases of establishment and growth that most of the regional accrediting associations did in the late 1800's (when they had six [6] member institutions or less--as did the Southern Association of Colleges and Schools in 1895). It is not anticipated that the constituency of the NAPNSC will ever exceed ten (10) or twelve (12) member institutions. In the Association's experience, through the denial of either correspondent or candidate status to applying institutions as well as the withdrawal of institutions from both statuses, few such private, free-standing institutions are likely to be willing or able to obtain qualified faculty to develop learning programs in accordance with the Association's criteria and standards. Curriculum development for such learning programs includes comprehensive criterion baselines of measurable performance objectives with matching criterion-referenced examinations for each competency area within a given degree program. The very small number of such legitimate, alternative institutions in foreign countries, public or private, which have emulated the prototype established by the University of London with its creation of the first widely known external degree programs in 1835, seems to bear this out. e.g.:

1. Centre National De Telé-Enseignément
   Paris, France

2. Fernuniversität
   Hagen, West Germany

3. Madurai University
   Madurai, India

4. Open University of the Netherlands
   (just forming)

5. The Open University of the United Kingdom
   Milton Keynes, Buckinghamshire, England

6. University of London
   London, England

7. University of South Africa
   Pretoria, South Africa

17. Q. **What were the first steps in the founding of the Association?**

A. The National Association of Private, Nontraditional Schools and Colleges was founded and its initial set of working criteria, standards and procedures were developed following action research by the founding incorporators with assistance and inputs elicited from representatives of twelve (12) interested institutions who attended the Association's initial planning and organizational meetings in Denver, on May 23 and 24, 1975 and September 27 and 28, 1975. (Specific research methods included systematic examination and adaptation of models and prototypes presented and analyzed in authoritative sources available to date (1975) for development of basic working documents (Handbook, etc.) as in-house publications.) Invitations for this preliminary group investigation had been given to twenty (20) institutions asking them each to send a representative to these planning meetings. The institutions comprising the initial charter member constituency included:

The University of Sarasota
California Western University
Laurence University
Western Colorado University
Pacific States University

18. Q. **Why is the office of the Executive Director and the Commission on Postsecondary Education of the NAPNSC located at an adjacent address and in the same building as one of its member institutions (Western Colorado University)?**

A. Virtually all institutional (regional) accrediting association's Commissions on Higher Education either presently operate, or have operated out of offices located on the campus or on other premises of one of their own member institutions (e.g., the Accrediting Commission for Senior Colleges and Universities of the Western Association of Schools and Colleges is located in an office of Mills College in Oakland, California

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which is a member institution accredited by that association. The Commission on Colleges of the Northwest Association of Schools and Colleges is located in an office on property owned by the University of Washington in Seattle, Washington, which is a member institution accredited by that association. The Commission on Institutions of Higher Education of the North Central Association of Colleges and Schools was most recently located in a building owned by the University of Colorado in Boulder, Colorado until spring, 1981, which is a member institution accredited by that association). The most logical explanation of this recurring situation would seem to be common purposes and common academic atmosphere. However, some critics of accreditation are quick to prejudge such instances as potential conflicts of interest.

19. Q. **Why is the Executive Director of the Association (NAPNSC) also an employee of one of the founding member institutions which is accredited by the Association (Western Colorado University)?**

A. While this condition is not desirable in terms of workload nor in the best possible interest of the member institution in question or the Association as regards equitable services and autonomy in decision-making functions, it is also not without precedent in the history of the development of accreditation in the United States.

Five (5) staff executives of the six (6) regional accrediting associations, and four (4) staff executives of eleven (11) national-specialized accrediting agencies and associations surveyed, were also employed simultaneously by one of the member institutions or programs accredited by each given agency during its early development. These administrative positions with the accrediting agencies were usually part-time. Some specific examples are given as follows:

> An executive secretary for the North Central Regional Accrediting Association was employed at the same time by the University of Chicago until 1955. An executive secretary for the New England Regional Accrediting Association was employed at the same time as Director of Placement at Harvard University until the mid-1950s. An executive secretary for the American Assembly of Collegiate Schools of Business was employed at the same time as an assistant dean at Washington University until 1963. An executive officer for the American Psychological Association was employed at the same time in a teaching position at the University of Maryland in 1951-52.

The most common reason given for discontinuing such dual employment practices was increased workload which eventually called for a full-time commitment in each of the executive staff officers' positions. This development resulted from growth of the accreditation field with a commensurate expansion of the executive director's job description.

This pattern is familiar in the founding, establishment and growth of other institutions and concepts in this country, educational and otherwise, and serves to illustrate that new processes or new applications of old processes must begin somewhere and be nurtured by someone and usually require additional effort. It is not anticipated that the dual involvement acknowledged in the above question will continue indefinitely.

In the meantime any external examiners who may be concerned about the above questioned dual employment are cordially invited to scrutinize the Association's charter member candidacy granting sequence, deliberation and decision-making processes, review committee and evaluating team member assignments, and the manner of all such measures taken to assure fairness, objective evaluation and an autonomous decision making process.

20. Q. **How were the regional and national-specialized accrediting agencies or associations founded?**

A. A thorough study of the histories of all regional (institutional) and national (programmatic and institutional) accrediting agencies or associations will reveal to you that they have been founded by their own member and/or accredited institutions or programs. They have all had to start somewhere and none have been founded by a government office or bureau at the federal level.

21. Q. **How does the Association's lack of formal recognition and listing by the Department of Education (USED) and the Council on Postsecondary Accreditation (COPA), affect the acceptance of degrees earned by graduates of the Association's member institutions?**

A. While it is true that the Association's petitioning and application efforts for recognition by the Department of Education and the Council on Postsecondary Accreditation are still in progress, the lack of recognition of the Association by those respective federal and private bureaus does not pose a problem at present for the majority of the student clientele served by the Association's member institutions for the following interrelated reasons:

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a. Institutional eligibility for federal funding is the only condition for which accreditation by a USED recognized agency might be legally required (see questions #4 and 24); otherwise accreditation is a voluntary endeavor by the institutions whether or not the accrediting agency concerned is recognized by the U.S. Department of Education or COPA.

b. The age range (35-55) of the mid-career adults, for whom these programs have the most appeal and serve a need, in most cases precludes their eligibility for federally funded student financial aid programs.

c. Since full-time student status is usually a requirement for participation in a federally funded financial aid provision, external students enrolled in a nontraditional degree program usually cannot qualify for such benefits because they are nearly always employed full-time throughout the working hours of the day and therefore cannot be classed as full-time students.

Even in view of the above, recognition and listing by both USED and COPA are desired and considered important to the Association, its member and potential member institutions and their potential and current students and alumni, as well as employers and other receiving institutions. This importance is based on the general public's reliance upon both COPA's assumed responsibility as monitor and reliable designator of reputable accrediting bodies and the assigned responsibility of the EAES and the Secretary of Education to determine reliable authorities as to quality of education offered.

22. **Q. What factors affect the policies of hiring and/or receiving institutions regarding the acceptance of earned academic degrees or credits of job applicants, current employees seeking promotion or salary advancement and transferring students?**

A. Recognition or acceptance of any academic or professional degree or earned credit is the prerogative of the receiving institution, employer, governing body or hiring/promotion committee as the case may be and is increasingly based upon the demonstrable learning outcomes resulting from the completed degree program.

23. **Q. How have employers regarded holders of degrees earned at member institutions of the Association?**

A. Some employers may either entertain or render an adverse decision regarding an applicant or current employee seeking promotion or salary increment who holds a degree from one of the Association's member institutions. The Association has found, however, that in the majority of such cases the provision of verification of the institution's status and progress in the accreditation process, along with the Association's working documents as requested and provided from the office of the Executive Director of the Association, has ameliorated the situation (NAPNSC working documents include the Handbook on Accreditation: Guidelines for Accreditation by Contract and related institutional-association information). The Association has endeavored to respond to such situations on a case by case basis and will continue with this service. Another factor conducive to prospective employer acceptance of such degrees is apprisal, and assurance from the NAPNSC office, of continuing Association petitioning and application relationships with the USED and COPA, and their criteria which specify that petitioning-applying agencies be engaged in ongoing accrediting service.

24. **Q. What advance measures can a prospective student of one of the Association's member institutions take to prepare for acceptance of a completed program?**

A. Many of the graduates of the Association's member institutions do not encounter employer resistance because they are already employed well-established professionals who, at the recommendation of the degree granting institution, had sought and obtained employer approval of the nontraditional program prior to enrollment.

25. **Q. Why are the National Association of Private, Nontraditional Schools and Colleges and its member institutions not listed in the USED annual Listing of Nationally Recognized Accrediting Agencies and Education Directory of Colleges and Universities and the COPA Guide to Recognized Accrediting Agencies and Directory of Accredited Institutions of Postsecondary Accreditation?**

A. Annual listings and directories of accrediting agencies and accredited postsecondary institutions published by both COPA and the Department of Education understandably contain only those agencies and institutions which they have formally recognized and listed.

Unfortunately such published directories have inadvertently given rise to a widespread, though incorrect notion that both the accreditation process and the "right" or authority to grant accreditation are given,

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or determined, or required by a central private bureau as well as a federal bureau.

In fact all regional and national-specialized accrediting agencies presently recognized and listed by COPA and the U.S. Department of Education and otherwise, are private, nonprofit organizations incorporated and legally authorized in the states where originally founded with statements of accrediting function and purpose along with other self-proclaimed functions and purposes as required in articles of incorporation by the respective states concerned.

26. Q. **Can accreditation be legally mandated or required for an educational institution?**

A. Accreditation by a USED recognized agency is required in most cases if the institution seeks participation in federally funded programs (see question #4). A distinguishing tenet of the American concept of accreditation from its beginnings has been the voluntary condition. No group has been more aware or more protective of the private and voluntary natures of accreditation than the administrative officers of COPA--former President Dr. Kenneth E. Young, Vice President Dr. Charles M. Chambers and newly appointed COPA President, Dr. Richard M. Millard.

The policy of the U.S. Department of Education on this issue is to support and encourage recognized, voluntary, nongovernmental accrediting associations.

27. Q. **How have private, freestanding, nontraditional universities and colleges in this country responded to or accepted the Association and the prospect of affiliation with it for serious accreditation purposes?**

A. It is obvious that the private, freestanding institutions purporting to be "nontraditional universities" which have proliferated in the United States have not come flocking to the Association, and it is not likely that there will ever be more than a handful of such legitimate, high quality institutions in this country. For an historical comparison, in the 146-year period since the advent of the University of London's external degree program (1835), the development of legitimate, respected, international nontraditional institutions outside this country has amounted to ten (10) or less. The Association's charter membership consisted of five (5) institutions. Membership has fluctuated from nine (9) to four (4), and presently stands at five (5)

although they are not all the same original charter members.

28. Q. **Why is the National Association of Private, Nontraditional Schools and Colleges needed in view of the increased concern for outcome based accreditation by the established regional and national-specialized accrediting bodies?**

A. It is true that the regional and national-specialized accrediting agencies and associations are shifting from an emphasis on institutional inputs and processes to increased emphasis upon learning processes and outcomes. This shift is in response to many of the recommendations of the COPA Project to Develop Evaluative Criteria and Procedures for the Accreditation of Nontraditional Education as well as the findings of other recent studies of nontraditional education generally and the external degree specifically as sponsored by the National Institute of Education (NIE), the Bureau of Social Science Research, Inc., and the American Council on Education (ACE).

This shift of emphasis in accreditation criteria and procedure is of benefit to students enrolled in so-called nontraditional and traditional programs alike and which are offered by those campus-based institutions accredited regionally, and in some instances by a long-established national-specialized agency.

At the same time, however, it must be considered that there are significant differences between campus-based internal students and non-campus-based external students and more particularly external students enrolled with freestanding institutions having no campus at all. A principal difference of the latter category of students is that they are not regional in their own geographical location or preference. Rather, they are national and in many instances international. There are obviously no regional-geographic limits and significantly fewer tendencies of where such students may reside as established professionals continuing in their external studies. For this reason those institutions which may qualify and make application for accreditation as legitimate, private, freestanding and nontraditional schools should be monitored by one accrediting agency with consistent application of one set of appropriate, effective criteria, standards and procedures wherever those institutions' administrative and branch offices and their widely dispersed student bodies may be located geographically.

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29. Q. To what extent do regionally and nationally accredited institutions and programs, (as well as some which are neither accredited nor involved in an accreditation process) which purport to develop and offer learning/performance/outcome-based degree programs, actually do so (whether identified as traditional or non-traditional)?

A. Aside from the commonly claimed outcome indicators such as follow-up studies of an institution's graduates, very few postsecondary institutions actually design, implement and assess learning programs on the basis of explicit, assessable learning outcomes. Some accrediting bodies allude to certain standardized testing instruments as basic and adequate equipment for assessing learning outcomes (e.g., the American College Testing Assessment Program [ACT] - an admissions, guidance, and placement instrument for entering freshmen; the Sequential Tests of Educational Progress [STEP] - a guidance instrument for evaluating first and second year college students' abilities to perform at the next higher level; the School and College Ability Tests [SCAT] - for the prediction of academic success; various student achievement tests in specific subject areas and in some professions, e.g., College Board Admissions [CBA], Advanced Placement Program [APP], College Level Examination Program [CLEP], College Placement Test Program [CPT], National Teacher Examinations Program [NTE] - all for prediction and placement in a learning program or selection of recruits for entry to a profession; the Graduate Record Examination [GRE] - for screening and prediction of academic success at the graduate level; the Miller Analogies Test [MAT] - for measurement and prediction of scholastic aptitude at the graduate school level.) Such instruments were actually designed for general diagnosis, prediction, screening, placement, specific remediation, and other entry level or formative learning determinations.

Only in some general and some limited, specific applications can such instruments be useful in assessment of course or overall program learning outcomes because they are designed as premeasures to be administered before the educational treatment or professional role-capacity. Therefore such predictors (carefully selected) might, in isolated cases, approximate an individual course's content and serve as a pre-test before the course, to be followed after the course is completed with an alternate, matched form administered as a post-test. However, the sobering and exacting realities of this question are that for systematic accountability of any real and precise consequence, an individually tailored baseline of explicit, measurable-assessable performance objectives must be designed, developed, and implemented

by the professor(s)/instructor(s) for each course, learning module, competency area, etc. which constitutes a complete degree program or other learning program. Such baselines should reflect the scope, foundation or competency areas and hierarchical structure of a carefully defined, identifiable degree program. These baselines should provide the examination item data pool out of which tailored, matching, or criterion referenced pre- and post-assessment instruments, each with alternate forms, are derived and developed, again by each professor/instructor, and then administered under appropriate examination conditions for institutional security, and finally evaluated and scored by the academic faculty. Without such precise and comprehensive benchmarks, learning outcomes cannot be confidently attributed to the provided delivery system or to any specific, identified, prior or planned learning experiences.

Such an undertaking of course entails a massive restructuring and overhaul of what has traditionally come to be regarded as an institution's learning programs or overall curriculum. This kind and scale of reform requires academic faculty (as curriculum developers) philosophically committed to the concepts and ramifications of learning outcome assessment as well as committed without reservation to the mission of the institution. Few institutions are willing or able to obtain and retain the professional services of such academic staff members who are appropriately qualified at all degree program levels contemplated and/or provided, and who are themselves committed to these concepts both philosophically and by daily performance. Anyone familiar with the kinds and amounts of teacher and administrator resistance encountered by attempts to implement the Stull Bill (AB293) passed in the 1971 California legislature, and similar teacher assessment mandates legislated in other states, is aware of how few educators are willing, much less enthused, to enter the kinds of exacting-purging experiences to be had in such a teacher-by-teacher, course-by-course reform.

Those private, freestanding institutions purporting to be nontraditional, degree granting universities and which in a few cases may have an impressive and very extensive list of adjunct readers, tutors/advisors, etc., etc. but which are without at least a nucleus of employed academic faculty members whose primary, current allegiance is to the institution (one each at least for each discipline in which degree programs are offered), are highly unlikely to have institutionally developed programs over which they have quality control. An illustrious letterhead and/or bulletin roster of part-time contributors, consultants or otherwise identified

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collaborators does not necessarily a legitimate, high quality university make.

By the same token, a purported "nontraditional" degree program offered within a "traditional" institution, or a consortium of participating "traditional" institutions, or an extension of a "parent" traditional institution (in each case basking in the protective shade of already established accreditation status--usually awarded prior to completion of the COPA-Kellogg Project), does not assure a learning/performance/outcome-based program.

Finally, the "nontraditional model(s)" which are reputedly being studied and developed by some accrediting bodies will not themselves assure soundly developed, assessable, outcome-based learning programs. There is no gimmick for, or quick shortcut to, the development and implementation of a well defined, hierarchically structured, degree program with outcome-based learning assessment referenced to a predetermined, criterion baseline of performance objectives for each and every course offering developed by the resident faculty of the controlling, granting institution. Such an endeavor requires long-term research, creativity, and curriculum-test development skills of a qualified and dedicated academic staff (see Guidelines and Examples throughout Section IV of the National Association of Private, Nontraditional Schools and Colleges [NAPNSC] Handbook on Accreditation: Guidelines for Accreditation by Contract).

30. Q. **Are not the regional accrediting associations becoming more accommodating and more willing to accredit private, freestanding, nontraditional institutions than they have been in the past?**

A. When all of the conditions of the qualifying terms "private," "freestanding," and "nontraditional" are considered, i.e.:

1. private (nonprofit or proprietary);

2. not affiliated in any way with a public school nor any extension or division of a public school or state system of schools supported by the public;

3. not affiliated with, nor a part of, any consortium of public or private, already accredited educational institutions;

4. entirely devoted as an institution (as opposed to a program or selection of programs) to a pattern or theme of nontraditional performance involving

alternative delivery systems, highly developed academic performance objectives and assessment modes, diverse human and other learning resources, flexible time-space provisions, etc., which in most cases precludes the need and therefore the existence of a campus in the usual sense, or significantly alters the nature of what might be regarded as a campus and in most cases significantly reduces the length of required resident, in-class instruction or eliminates the need for resident study altogether;

how many private, freestanding, wholly nontraditional institutions can you count that have actually achieved full accreditation from a regional accrediting association? How many have achieved candidate status or pre-accreditation status by some other name? How many have applications in a state of deferral for an indefinite period of time? This makes for an interesting investigation and the Executive Director of the Association would be happy to discuss the extenuating circumstances of such institutions with you at any time.

31. Q. **What are the relationships and/or similarities between national/regional accreditation and licensure, authorization, approval and other comparable procedures as administered within states by state departments of education, specified state boards or by state commissions of higher education?**

A. Until recent years most state education officials have maintained that they are not in the accreditation business. With the notable exception of the New York State Board of Regents, departments of education, boards and higher education commissions at the state level have preferred to confine their functions to coordination, authorization and regulation within their respective states, leaving the accreditation function for institutions within their borders entirely to the appropriate private, national or regional accrediting agencies and associations. However, some states such as California and Florida have found it necessary to develop licensure, authorization or approval requirements with structures and procedures, especially for private, independent institutions, which closely resemble many of the criteria, standards and procedures of the accreditation concept.

A movement initiated by the Carter administration and which is likely to be intensified by the Reagan administration, is to promote an increasing role of each of the states in the administration of many educational policies which have become unwieldy and unduly expensive at the federal level. The determination of eligibility

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for participation in federally funded programs and other functions often associated with accreditation, as well as certain elements of the accreditation process, may eventually become parts of the increased role of the states in serving both public and private education.

32. Q. **What are the costs of accreditation?**

A. As with performance of any professional service, the expertise needed for accreditation functions requires qualified professional, secretarial and clerical personnel whose formal education, work experience and insights call for appropriate compensation. The institution will incur many expenses in required development of curriculum, instructional materials and assessment instruments as well as the self study with printing and production costs to be met throughout. The obtaining of consultant services in preparation for various phases of the accreditation process will be a likely need, especially for new institutions.

The accrediting agency itself sustains daily operational expenses as it responds to inquiries, conducts libary and action research and incurs continuing development, printing, production and mailing costs incident to services and working documents. Additional details not without their cost include attending to the many details of planning, assignments, arrangements and travel needed for board and commission meetings and consultation as well as on-site evaluations of applying and member institutions.

An inescapable reality is that virtually all accreditation costs are ultimately borne by the institution and its student clientele. Some typical categories and ranges of accreditation costs for one (1) member institution are given as follows:

Fees	Range from	to
Application	$ 250.00	$1,600.00
On-site Evaluation	1,800.00	6,000.00
Annual Dues	400.00	5,400.00
Consultation	100.00	500.00
Team Member Honoraria	100.00	350.00

Annual dues and on-site evaluation fees are often graduated in accordance with the number of team members required and with student body size, e.g., rates may increase with increased number of students in multiples of 1000 up to 10,000. On-site evaluation expenses recur after periods ranging from two (2) to five (5) years.

The foregoing dollar amounts represent approximate costs current as of September, 1981.

33. Q. **What are the affordable and defensible benefits (cost effectiveness) of accreditation--if any?**

A. Social advantage, prestige and camaraderie were numbered high among motives for forming and seeking admission to educational associations early in the history of accreditation. However, maturity of education generally and accreditation specifically is bringing an emergence of other values including awareness and desire for accountability for the cost effectiveness of our personal efforts and our dollar and material expenditures.

Accreditation should stand the same hard question put to other educational endeavors. Do the outcomes warrant the expense?

I would submit that the costs can and should be borne only if the accreditation concept and process are predicated upon measurable-assessable performance objectives and corresponding demonstrable, learned performance outcomes.

Unequivocal achievements of educationally defensible objectives of the student's learning program and thereby accomplishment of institutional purposes would be judged as worthwhile benefits of accreditation by most critics if such cause-effect relationships can be established.

Accreditation should not only facilitate the cost effectiveness of educational programs but should itself, as a process, be subject to the rigors of a test for cost effectiveness with such factors as: given unit(s) of expenditure, per given unit(s) of accreditation process, per given unit(s) of learning outcomes.

This Accreditation Fact Sheet will be continuously augmented and updated as developments and changes occur in accreditation nationally as well as in state and other local instances of note. The Fact Sheet and other documents and publications of the Association are available from this office upon request.

Grand Junction, Colorado
September, 1981

H. Earl Heusser
Executive Director
(303) 243-5441

The following personal and organizational sources as well as bibliographical sources are provided to facilitate further research, or for confirmation of the accuracy of the foregoing information as needed.

PERSONAL AND ORGANIZATIONAL SOURCES

Classification by Type

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Department of Education (USED)

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400 Maryland Avenue, S.W.
Washington, DC 20202
(202) 245-9873

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Office of Postsecondary Education
ROB 3, Room 3030
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Washington, DC 20202
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Regional Accrediting Associations

Middle States Association of Colleges and Schools
Commission on Higher Education
Dr. Robert Kirkwood, Director
3624 Market Street
Philadelphia, PA 19104
(215) 662-5606

New England Association of Schools and Colleges
Dr. William J. MacLeod, Director of Evaluation
Commission on Institutions of Higher Education
131 Middlesex Turnpike
Burlington, MA 01803
(617) 272-6450

North Central Association of Colleges and Schools
Dr. Thurston E. Manning, Director
Commission on Institutions of Higher Education
159 North Dearborn Street
Chicago, IL 60601
(800) 621-7440

Northwest Association of Schools and Colleges
Dr. James F. Bemis, Executive Director
3700-B University Way, N.E.
Seattle, WA 98105
(206) 543-0195

Southern Association of Colleges and Schools
Mr. Gordon W. Sweet, Executive Secretary
795 Peachtree Street, N.E.
Atlanta, GA 30365
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Western Association of Schools and Colleges
Accrediting Commission for Senior Colleges and Universities
Dr. Kay J. Anderson, Executive Director
c/o Mills College, Box 9990
Oakland, CA 94613
(415) 632-5000

National-Specialized Accrediting Agencies and Associations

Accreditation Board for Engineering and Technology, Inc.
(ABET)
Dr. David R. Reyes-Guerra, Executive Director
345 East 47th Street
New York, NY 10017
(612) 644-7685

Accrediting Commission on Education for Health Services Administration (ACEHSA)
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One Dupont Circle, N.W.
Washington, DC 20036
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American Association for Marriage and Family Therapy (AAMFT)
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American Association of Bible Colleges (AABC)
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American Bar Association (ABA)
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American Council on Pharmaceutical Education (ACPE)
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The American Dietetic Association (ADA)
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American Library Association (ALA)
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American Optometric Association (AOA)
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American Physical Therapy Association (APTA)
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American Psychological Association (APA)
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American Society of Landscape Architects (ASLA)
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American Speech-Language-Hearing Association (ASLHA)
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American Veterinary Medical Association (AVMA)
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Association of Independent Colleges and Schools (AICS)
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The Council on Chiropractic Education (CCE)
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Council on Education for Public Health (CEPH)
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Foundation for Interior Design Education Research (FIDER)
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730 Fifth Avenue
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Liaison Committee on Medical Education of the Council on Medical Education of the American Medical Association and the Executive Council of the Association of American Medical Colleges (LCME)

The LCME is administered in odd-numbered years, beginning each July 1, by:
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American Medical Association
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National Architectural Accrediting Board, Inc. (NAAB)
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National Association for Practical Nurse Education and Service, Inc. (NAPNES)
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National Association of Private, Nontraditional Schools and Colleges (NAPNSC)
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National Council for Accreditation of Teacher Education (NCATE)
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National Home Study Council (NHSC)
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National League for Nursing, Inc. (NLN)
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Society of American Foresters (SAF)
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Professional Educational Associations

American Council on Education (ACE)
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Association of American Universities (AAU)
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State Level Agencies

Ambach, Mr. Gordon M., Commissioner of Education
New York State Board of Regents/State Education Department
The University of the State of New York
Albany, NY 12234
(518) 457-3300 -or- (518) 474-5844

Freeberg, Dr. C. Wayne, Director
Florida State Board of Independent Colleges
and Universities
Department of Education
Tallahassee, FL 32304
(904) 488-8695

Peterson, Mr. John H., Chief
Office of Private Postsecondary Education
California Department of Education
State Education Building
721 Capitol Mall
Sacramento, CA 95814
(916) 445-3427

International Institutions

Centre National de Telé-Enseignément
12 Place du Pantheon
Paris 75005, France
Telephone:

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French Embassy
Attention: Cultural Division
972 Fifth Avenue
New York, NY 10021
(212) 570-4400

Fernuniversität
Postfach 94020
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Embassy of India
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Open University of the Netherlands
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University of South Africa
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South African Embassy
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Current NAPNSC Member Institutions

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California Western University
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Pacific States University
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Los Angeles, CA 90006
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University of Sarasota
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Western Colorado University
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(303) 245-3880

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